

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 JAMES ALEC DOUGLAS,

Defendant.

Case: 2:17-cr-20723  
Judge: Borman, Paul D.  
MJ: Patti, Anthony P.  
Filed: 10-26-2017 At 03:28 PM  
SEALED MATTER (NA)

VIOLATIONS: 18 U.S.C. §§ 1028A,  
1542

**INDICTMENT**

THE GRAND JURY CHARGES

**COUNT ONE**

(False Statement in Passport Application – 18 U.S.C. § 1542)

D-1 JAMES ALEC DOUGLAS

On or about June 30, 2017, in the Eastern District of Michigan, defendant, JAMES ALEC DOUGLAS, willfully and knowingly made false statements in an application for a passport with the intent to induce or secure the issuance of the passport under the authority of the United States for his own use, contrary to the laws regulating the issuance of passports or the rules prescribed pursuant to such laws, in that in such application defendant, JAMES ALEC DOUGLAS, identified himself using the name and date of birth of VICTIM 1, and the social security

number of VICTIM 2, which defendant, JAMES ALEC DOUGLAS, knew were not his true name, date of birth, and social security number.

All in violation of Title 18, United States Code, Section 1542.

**COUNT TWO**

(Aggravated Identity Theft – 18 U.S.C. § 1028A)

D-1 JAMES ALEC DOUGLAS

On or about June 30, 2017, in the Eastern District of Michigan, defendant, JAMES ALEC DOUGLAS, possessed and used, without lawful authority, a means of identification of another person, namely VICTIM 1's name and date of birth, during and in relation to a felony offense, namely making a false statement in an application for a passport, in violation of Title 18, United States Code, Section 1542.

All in violation of Title 18, United States Code, Section 1028A.

**COUNT THREE**

(Aggravated Identity Theft – 18 U.S.C. § 1028A)

D-1 JAMES ALEC DOUGLAS

On or about June 30, 2017, in the Eastern District of Michigan, defendant, JAMES ALEC DOUGLAS, possessed and used, without lawful authority, a means of identification of another person, namely VICTIM 2's social security number,

during and in relation to a felony offense, namely making a false statement in an application for a passport, in violation of Title 18, United States Code, Section 1542.

All in violation of Title 18, United States Code, Section 1028A.

THIS IS A TRUE BILL

s/Grand Jury Foreperson  
Grand Jury Foreperson

DANIEL L. LEMISCH  
Acting United States Attorney

s/Gary Felder  
Gary Felder  
Assistant United States Attorney  
Deputy Chief, National Security Unit

s/Michael C. Martin  
Michael C. Martin  
Assistant United States Attorney

Dated: October 26, 2017

United States District Court  
Eastern District of Michigan

**Criminal Case Cover Sheet**

Case: 2:17-cr-20723  
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete the following information.

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <b>MC</b>

Case Title: USA v. James Alec Douglas

County where offense occurred : Wayne County, Michigan

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ Information --- no prior complaint.  
☐ Indictment/ Information --- based upon prior complaint [Case number: \_\_\_\_\_]  
☐ Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 26, 2017

Date

*Michael C. Martin*

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Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.